



219 North Rocks Road, North Rocks, NSW, 2151

7 April 2025

To whom it may concern,

Unilever Australia supports Soft Plastic Stewardship Australia's (SPSA) application for authorisation under the *Competition and Consumer Act 2010* (Cth).

SPSA supports Australia's national packaging targets and aligns with Unilever's ambitious global plastic packaging targets:

- Virgin plastic reduction: Reduce our virgin plastic footprint by 30% by 2026, and 40% by 2028
- Reusable, recyclable or compostable plastic packaging: 100% of our plastic packaging to be reusable, recyclable or compostable by 2030 (for rigids) and 2035 (for flexibles)
- Recycled plastic: Use 25% recycled plastic in our packaging by 2025
- Collection and processing: Collect and process more plastic packaging than we sell by 2025

Unilever is one of the world's leading suppliers of Beauty & Wellbeing, Personal Care, Home Care, Nutrition and Ice Cream products, with sales in over 190 countries and products used by 3.4 billion people every day.

In Australia and Zealand, Unilever employs over 900 people and has offices and manufacturing facilities spread across the Sydney CBD, North Rocks, Tatura, Minto and Auckland. Our local brands include household staples such as Dove, Rexona, Lynx, Vaseline, OMO, Surf, TRESemmé, Continental, Ben & Jerry's and Streets.

Unilever Australia is a member of the Australian Food & Grocery Council (AFGC) and we were a Foundation Supporter of the National Plastics Recycling Scheme (NPRS). Unilever Australia produces a variety of products packaged in soft plastic, including Streets ice creams, OMO laundry capsules and Simple face wipes. While we have explored plastic alternatives, for certain applications such as frozen food, soft plastic is the most suitable format due to safety, hygiene and functionality factors.

The SPSA scheme will help create significant environmental, economic and social benefits for Australia.

Annually, 538,000 tonnes of soft plastics are consumed in Australia, yet only 6% are recovered. Meanwhile, approximately 300,000 tonnes of recyclable soft plastic - worth over \$500 million - currently end up in landfill or the environment.

As a producer of products packaged in soft plastic, we want to ensure these materials do not end up in landfill or the environment. Instead, we want to see soft plastics recycled to redirect significant economic value from landfill back into domestic supply chains.



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By consolidating and scaling up soft plastics collection via instore, kerbside, and drop off channels, SPSA will increase the availability of recycled content, reduce reliance on imported materials and bolster domestic recycling capacity. Currently, availability of recycled soft plastic – both food grade and non-food grade - is limited in Australia and it is significantly more expensive than virgin soft plastic. As such, Unilever supports SPSA in their mission to establish a local circular value chain where soft plastics are collected, recycled and reused.

Furthermore, the Scheme will stimulate growth in the recycling sector and help create jobs, with recycling generating up to three times as many employment opportunities compared to landfill.

We are confident that as an independent, not for profit entity, with global best practice governance principles, SPSA is well equipped to run effectively and transparently, to achieve its overarching mission.

Regarding the proposed levies, as a global business Unilever has seen the implementation of other stewardship schemes and understands the importance of ongoing, reliable funding to maintain the viability of these schemes. Setting a levy will help ensure Australia's soft plastic challenge is managed equitably across the value chain. While the scheme is currently voluntary, we would support a mandatory scheme to ensure there are no free riders. While there may be some initial concerns regarding the levy, SPSA's current proposed levy is up to 90% lower than comparable global schemes.

For the reasons outlined above, Unilever Australia encourages the ACCC to grant SPSA authorisation to enable the rollout of this transformative scheme. ACCC approval will provide Unilever with long term investment confidence and catalyse further industry engagement, whilst aligning to Australia's current regulatory framework and ensuring flexibility to meet potential future policy reforms.